

SANTA MONICA MOUNTAINS CONSERVANCY

LOS ANGELES RIVER CENTER AND GARDENS
570 WEST AVENUE TWENTY-SIX, SUITE 100
LOS ANGELES, CALIFORNIA 90065
PHONE (323) 221-8900
FAX (323) 221-9001



February 26, 2007

Jimmy C. Liao, City Planner
Environmental Review Section
Department of City Planning
200 North Spring Street, Room 750
Los Angeles, California 90012

**Valleyheart Senior Community
Notice of Preparation Comments
EAF NO: ENV-2001-1196-EIR**

Dear Jimmy C. Liao:

The Santa Monica Mountains Conservancy is the principal State planning agency for the upper Los Angeles River. Any discretionary project proposed along the river and its tributaries should be examined for the maximum opportunity to provide public open space and storm water treatment benefits. The proposed project along the main channel of the river provides unprecedented opportunity for river revitalization in the San Fernando Valley.

The proposed project, and most similar-sized residential projects, would result in significant adverse traffic impacts and the substantial loss of urban open space. In addition the height of the proposed structures would result in adverse visual impacts. These impacts must be mitigated to a level less than significant.

The Conservancy proposes two project alternatives that would reduce the direct project impacts and provide mitigation via the provision of larger open space areas along the existing public rights-of-ways that parallel the Los Angeles River. We respectfully request that both of these two alternatives, or similar variations therein, be fully addressed in the Draft Environmental Impact Report (DEIR) as project alternatives. Depictions of both alternatives are attached. Both alternatives provide an increase in both permanent existing public open space and future public open space by shortening the length of the Valley Heart Drive access road. They are both similar in that they propose additional access points in order to allow for the length reduction of Valley Heart Drive. They differ most in

the amount of tennis courts and residential units eliminated. Both proposed Conservancy alternatives maximize the use and integration of the existing Los Angeles County flood control property and both used and unused City of Los Angeles street rights-of -ways.

Full River Park Buffer Alternative

The "Full River Park Buffer Alternative" would increase the amount of open space over what is currently proposed. The 40 unit building to the southwest, the putting green and two tennis courts would be removed to preserve open space. The open space preserved would be contiguous with the Los Angeles River and would maximize habitat and recreation opportunities.

Compromise River Park Buffer Alternative

The "Compromise River Park Buffer Alternative" would preserve the southern edge of the development for use as a recreation trail and an emergency access road. The unused small areas along the edge of the property should be incorporated into the recreation corridor with natural landscaping. This provides a seamless transition between the proposed community and the river corridor.

The draft EIR for the project must clearly state that recreation uses on the site will be permanently available to the public. The EIR should also state the hours of public access to these facilities.

We strongly recommend that the developers work closely with the Mountains Recreation and Conservation Authority (MRCA) and other agencies to ensure compatibility of the project with the river corridor. Among these efforts we would like to continue to explore the various recreational, river access, stormwater management, aesthetic, and restoration opportunities that can be integrated into the proposed project. Many of these opportunities would provide places for senior citizens to enjoy nature in the middle of the city.

We appreciate the opportunity to comment. Please direct any questions and further correspondence to Ken Frederick of our staff at (323) 221-9944 ext. 137.

Sincerely,

ELIZABETH A. CHEADLE
Chairperson

